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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

In re:

## VIRGINIA TRUE CORPORATION

**Debtor**

## Chapter 11

VIRGINIA TRUE CORPORATION

Plaintiff

Adv. Pro. No. 19-1118-nhl

DIATOMITE CORPORATION OF AMERICA  
Intervenor-Plaintiff  
against

ANTHONY CIPOLLONE and  
DOMENICK CIPOLLONE.  
Defendants

## DECLARATION

Vicente Penades, being over eighteen years of age, residing in Valencia, Spain, deposes and states:

1. I am the managing member of Warlock Acquisitions, S.L. (“Warlock”), which is the sole member of Pan American Claim Investors, LLC (“Pan American”) and submit this declaration in response to the objection and declaration of Rishi Kapoor, Esq. on behalf of Diatomite Corporation of America (“Diatomite”) seeking to have the agreement and resolution of issues with the Debtor and Dominick Cipollone and Anthony Cipollone denied by this Court.

2. Howard Kleinhendler and Benito Fernandez are not members of and have no interest in Warlock or Pan American.

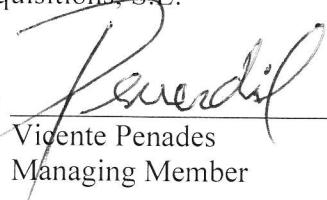
3. Mr. Kapoor's argument that the Debtor has no ability to move forward with the development of the Debtor's real property at issue is without merit. Assuming the settlement is approved, Pan American will be assisting the Debtor to raise a considerable sum of money, \$2,000,000.00 US, toward development.

I declare, under the penalties of perjury under the laws of the United States of America, that the foregoing is true and correct.

Dated: July 23, 2021

Pan American Claim Investors, LLC  
by its Sole Member, Warlock  
Acquisitions, S.L.

By:

  
Vicente Penades  
Managing Member